

EXHIBIT 77

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL)
4 PRESCRIPTION) MDL No. 2804
OPIATE LITIGATION)
5 _____) Case No.
) 1:17-MD-2804
6)
THIS DOCUMENT RELATES) Hon. Dan A.
7 TO ALL CASES) Polster

FRIDAY, JANUARY 4, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped deposition of Ramona Sullins, held at the offices of JONES DAY, 77 West Wacker Drive, Chicago, Illinois, commencing at 7:31 a.m., on the above date, before Carrie A. Campbell, Registered Diplomate Reporter, Certified Realtime Reporter, Illinois, California & Texas Certified Shorthand Reporter, Missouri & Kansas Certified Court Reporter.

21 - - -
22 GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 together.

2 Q. At the time it was your
3 understanding that the Reddwerks project was
4 simply -- strike that.

5 What was your understanding of
6 why the Reddwerks project was needed during
7 this time period?

8 A. During 2010?

9 Q. Yeah. 2011.

10 A. I'm sorry. That we needed to
11 put in a threshold order level alert into the
12 system. That was my understanding.

13 Q. But you didn't have any
14 understanding as to why that system was
15 needed, correct?

16 A. Correct.

17 Q. And indeed that system wasn't
18 limited to Schedule II products, correct?

19 A. Correct.

20 Q. And it wasn't limited to
21 Schedule III products, correct?

22 A. Correct.

23 Q. It applied to all -- strike
24 that.

25 It applied to all prescription

1 products, correct?

2 A. It applied to all products.

3 Q. When did the rollout of the
4 C-S-O-S, CSOS, occur?

5 A. I think we did a pilot in 2012,
6 at the end of 2012.

7 Q. Was the CSOS specific to 6045?

8 A. Yes.

9 Q. Do you recall when it was
10 actually put in practice in 6045?

11 A. 2000 -- I'm guessing 2013 if we
12 did it at the end of 2012.

13 Q. While you were working on CSOS,
14 did you have any understanding as to why
15 Walmart was implementing that process?

16 A. To go away from the paper 222
17 forms.

18 Q. And did you have any further
19 understanding as to why Walmart wanted to go
20 away from the paper 222s?

21 A. No. We had -- we had old
22 computers that were running the system and
23 old dot matrix printers that were obsolete,
24 and we couldn't find replacements for those,
25 so that was a part of the initiative to move

1 to the electronic CSOS.

2 Q. And at some point did you
3 become aware that Walmart -- Walmart
4 Distribution Center 6045 was running daily
5 over 20 reports?

6 A. I did become aware of it. I
7 was -- may have been copied on a couple of
8 e-mails on that, yeah.

9 Q. Sorry. You said you were
10 copied on a couple of e-mails; is that
11 correct?

12 A. I don't know how many. I
13 believe I was -- I had one e-mail or
14 something.

15 Q. Well, weren't you, in fact, the
16 person to inform the folks at DC 6045 of the
17 new process?

18 MS. FUMERTON: Objection.

19 Form.

20 THE WITNESS: I don't recall.

21 QUESTIONS BY MR. BOWER:

22 Q. You don't recall one way or the
23 other; is that correct?

24 A. I don't recall informing them.

25 Q. Do you recall having meetings

1 about the process?

2 A. No.

3 Q. Do you recall discussing the
4 process with Bart?

5 A. No.

6 (Walmart-Sullins Exhibit 2
7 marked for identification.)

8 QUESTIONS BY MR. BOWER:

9 Q. Okay. You've been handed
10 what's been marked as Exhibit 2 to today's
11 deposition. It's an e-mail -- short e-mail
12 chain to yourself and others in July of 2012.

13 Let me know when you've had a
14 chance to review it.

15 A. Okay. Okay.

16 Q. Does this refresh your
17 recollection regarding your role in rolling
18 out this process at 6045?

19 A. It does.

20 Q. Okay. And what was your role?

21 A. To inform them to put the -- to
22 let them know that there was going to be a 20
23 limit on the oxy 30.

24 Q. And why were you the one that
25 was supposed to inform them of that?

1 A. Because I had to send an e-mail
2 to Reddwerks, and I had owned that
3 relationship with Reddwerks.

4 Q. Okay. Did you also own the
5 relationship with the DC team?

6 A. I was one of, you know, three
7 that owned that relationship as well.

8 Q. All right. And indeed, your
9 e-mail says "DC team, we," affecting
10 inclusion of yourself, correct?

11 I mean, it's your words, right?
12 You say, "DC team, we," right?

13 A. Right.

14 Q. Right?

15 "We have been asked to limit
16 the quantity of Item 3880693, oxycodone 30."

17 Do you see that?

18 A. I do.

19 Q. Okay. Did you have at that
20 time any understanding as to why that was
21 occurring?

22 A. No.

23 Q. Did it matter to you?

24 A. No, I was just asked to do it.

25 Q. And who asked you to do it?

1 A. From this e-mail, it looks like
2 Brandon.

3 Q. Well, let's look at that
4 e-mail, all right?

5 Brandon writes, "Ramona, as we
6 discussed today," correct?

7 A. Right.

8 Q. "And based on Bart's data,"
9 right?

10 Do you know what data he's
11 referring to?

12 A. No, I don't.

13 Q. Do you know who Bart is?

14 A. Bart was in replenishment.

15 Q. Do you know what data he
16 provided?

17 A. No, I don't know what data he
18 provided. I don't recall it.

19 Q. And Brandon goes on to write,
20 he says, "After two weeks, we will then visit
21 on what our next step of drugs to focus on
22 will be."

23 Do you see that?

24 A. I see that.

25 Q. Do you and him visit on "what

1 our next step of drugs" we'll focus on will
2 be?

3 A. I don't recall.

4 Q. Do you recall -- strike that.

5 All right. Are you aware the
6 country is undergoing an opioid epidemic?

7 A. I am aware of that.

8 Q. When did you become aware of
9 that?

10 A. I don't know exactly when.
11 I've seen it in the news.

12 Q. Did you ever discuss it at
13 work?

14 A. No.

15 Q. No?

16 Didn't concern you at all that
17 you had a role in limiting one of the most
18 highly abused drugs in the country?

19 MS. FUMERTON: Objection.

20 Form.

21 THE WITNESS: Ask your question
22 again.

23 QUESTIONS BY MR. BOWER:

24 Q. Did it concern you at all that
25 you played a role in limiting the ordering by

1 Walmart pharmacies of one of the highest
2 abused drugs in the country?

3 MS. FUMERTON: Objection.

4 Form.

5 THE WITNESS: Was I concerned?

6 QUESTIONS BY MR. BOWER:

7 Q. Yeah.

8 A. No, I was asked to do
9 something.

10 Q. Okay. Are you aware that
11 oxy 30 was being -- strike that.

12 Are you aware that orders of
13 oxy 30 were being limited because of its
14 potential for abuse?

15 MS. FUMERTON: Objection.

16 Form.

17 THE WITNESS: No, I had no
18 knowledge of why.

19 QUESTIONS BY MR. BOWER:

20 Q. Did it matter to you from your
21 perspective?

22 MS. FUMERTON: Objection.

23 Form.

24 THE WITNESS: I was asked to do
25 a job.

1 QUESTIONS BY MR. BOWER:

2 Q. And so let's get into more of
3 what job you were asked to do.

4 Okay?

5 A. Okay.

6 Q. Your first e-mail here, the
7 bottom says, "Brandon, came looking for you
8 to discuss the queries I had ran on the items
9 listed below."

10 Why were you running those
11 queries?

12 A. I was asked to run those.

13 Q. And who asked you to run those?

14 A. Tim Harris.

15 Q. Tim Harris.

16 And what queries did he ask you
17 to run?

18 A. To run data on multiple items.

19 Q. Do you have any idea why you
20 were running on the -- a query for the
21 Item 3880910?

22 A. No, I was just asked to run it.

23 Q. Did you ever ask why?

24 A. No.

25 Q. What -- where did you run these

1 queries?

2 A. In Teradata.

3 Q. And what's Teradata?

4 A. So it's a place where all, to
5 my understanding, data lives for, in this
6 case, shipment.

7 Q. What do you mean by "shipment"?

8 A. Ships to the store.

9 Q. Who would you have e-mailed at
10 Reddwerks to make the appropriate change to
11 the order level alert parameter screen?

12 A. It would have been a support
13 call to --

14 Q. Well, it says "I will be
15 sending Reddwerks an e-mail."

16 Do you see that?

17 A. Yes.

18 Q. So that statement is not
19 correct?

20 A. So it's a support e-mail
21 address.

22 Q. Oh, okay.

23 Do you recall what that e-mail
24 address is?

25 A. It used to be

1 support@Reddwerks.com.

2 Q. And after you sent that e-mail,
3 how long would it have taken for this change
4 to be made?

5 A. An overnight change.

6 Q. Do you recall what the prior
7 order level alert was for oxy 30?

8 A. I don't recall.

9 Q. And then in your e-mail you
10 write, "If we receive calls from the stores
11 asking for additional oxy 30 product, please
12 direct them to the regional."

13 Why did you write that?

14 A. Because we had stores that
15 would call the distribution center to be
16 added for an additional day of shipment.

17 Q. I understand that stores could
18 call, but why are you directing them to the
19 regional?

20 A. To the store's regional.

21 Q. Why are you providing that
22 instruction?

23 A. I don't recall, other than
24 that's what we would do.

25 Q. How did you know that that was

1 the appropriate thing to do?

2 A. I don't know. I mean, that's
3 what we did with stores, is direct them to
4 who their boss was.

5 Q. So by the regional -- the
6 regional would be referring to the store's
7 boss?

8 A. Yes.

9 Q. And then you next write, "Also,
10 we will need to keep track of the stores
11 calling in to the DC or submitting a web form
12 for additional oxycodone 30 product."

13 Do you see that?

14 A. Yes.

15 Q. Why did you write that?

16 A. I really don't know, other than
17 to keep track of who was calling in so that
18 we could report that back to their regional.

19 Q. But you didn't know why there
20 was a specific emphasis on oxy 30; is that
21 correct?

22 A. That's correct.

23 Q. And you never asked anybody why
24 oxy 30, correct?

25 A. No, I did not.